



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

November 17, 2022

Hannah Pell
TMI-2 Energy Solutions
121 W Trade Street
Suite 2700
Charlotte PA 282020000

RE: ER Project # 2021PR03278.006, TMI-2 Decommissioning Project, Dauphin County, Pennsylvania,
Nuclear Regulatory Commission, Conoy Township, Lancaster County

Dear Ms. Pell,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Above Ground Resources

Identification of Historic Properties – More Information Requested

The purpose of this letter is to clarify the PA SHPO response dated 9/12/2022 with regards to the Identification of Historic Properties, specifically Three Mile Island.

While we understand that this project is limited to TMI-2, it is necessary to assess the property in its entirety due to potential effects. It should be noted that the evaluation in 2010 took place before the property was 50 years of age; consequently, only considering the exceptional significance of the property in relation to the events of March 28, 1979-April 4, 1979. Now that the property has achieved 50 years of age, it is necessary to assess and evaluate other potential areas and/or periods of significance for the historic property, covering the entire time frame in which the plant was constructed and operated.

Potential areas of significance may include (but not be limited to):

- Engineering. What aspects of the construction of the site could be significant? Were any models for use in other places? Is TMI an example of a trend in engineering design?
- Labor History. TMI construction was delayed by worker strikes and environmental concerns being raised. Were any changes physically made to the property to address environmental or labor concerns?
- Social History. What is the significance of the public outreach campaigns that occurred when the plant opened? After the near meltdown?

The TMI-2 Control Room was also identified as a contributing factor to the accident, stating “the control room is huge, with hundreds of alarms, and there are some key indicators placed in locations where the operators cannot see them”; and that “lessons from previous accidents did not result in new, clear instructions being passed on to the operators.” Were corrections to this made at TMI-1? What physically changed in nuclear stations as a result of this incident? Is there any evidence of this at TMI-1?

Additionally, as previously noted, the resource is likely the entire island, and not portions of the built environment. Additional information is needed to clarify the appropriate island-wide boundary, and which resources are contributing and non-contributing. This should include roads, bridges, structures, and buildings. Please note, if the Area of Potential Effects extends beyond the island due to potential visual effects, further exploration of the relationship and potential significance between the plant and those neighboring communities may be necessary.

For questions concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Emma Diehl".

Emma Diehl

Environmental Review Division Manager